

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

-----X,

JACOB PADWA,

Plaintiffs,

Case No. 3:17-cv-07710



-against-

STIPULATION OF DISMISSAL

AMERICAN EXPRESS COMPANY,

WITH PREJUDICE

Defendants.

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Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiff JACOB PADWA ("Plaintiff") and Defendant AMERICAN EXPRESS COMPANY ("Defendant"), by and through their respective Counsel of record file this Stipulation of Dismissal with Prejudice on account of settlement and in support thereof state as follows:

1. Because of disputes over liability and damages and because of the uncertainties of litigation, Plaintiff and Defendant have compromised and settled all claims and causes of action that were or could have been asserted by Plaintiff against Defendant and by Defendant against the Plaintiff arising out of or in any way related to the matters raised in the above captioned action, filed under case no. 17-cv-07710 . Plaintiff no longer wishes to pursue this action against Defendant and withdraws his claim with prejudice. There is no counterclaim.

2. Each party entered into the settlement agreement voluntarily and knowingly, and understands fully the meaning and effect of its executing said agreement. The parties agree that the terms of the settlement agreement are just and fair.

3. The parties agree that this action should be dismissed with prejudice, with each party to bear his or its own attorneys' fees and costs.

Dated: April 15, 2018

Respectfully submitted,

Edward B. Geller, Esq., P.C.

By /s/Edward B. Geller, Esq.

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